

### **REMARKS/ARGUMENTS**

This Amendment is in response to the Final Office Action mailed January 07, 2008. Claims 4-12, 15-17, 19-31, 38-48, 60-64, and 71-74 were pending in the present application. This Amendment amends claims 4-12, 15-17, 21-23, 26-31, 38, 40-41, 43-48, 60-64 and 71-72, cancels claims 24-25 and adds claims 78-80, leaving pending in the application claims 4-12, 15-17, 19-23, 26-31, 38-48, 60-64, and 71-74, 78-80. Reconsideration of the rejected claims is respectfully requested.

#### **I. Rejection under 35 U.S.C. §112**

Claims 4-6, 15-31, 38-48, 60-64, 71-74 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as invention. The Office Action alleges that there are no implementation details to enable how a 'customized user interaction' is being same for each of the plurality of application user interfaces per a requesting user.

Claim 4 as amended does not recite such a 'customized user interaction' and is believed to be definite and meet the requirements of 35 U.S.C. §112, second paragraph.

Claims 5-6, 15-31, 38-48, 60-64, and 71-74 have also been amended and do not recite such a 'customized user interaction' and are believed to be definite and meet the requirements of 35 U.S.C. §112, second paragraph.

Withdrawal of the rejections under 35 U.S.C. §112 is respectfully requested.

#### **II. Rejection under 35 U.S.C. §102**

Claims 4-12, 15-17, 19-27, 29-31, 38-48, 60-64, and 71-74 are rejected under 35 U.S.C. §102(e) as being anticipated by *Beauchamp* (US Patent No. 6,621,505). Applicants respectfully submit that *Beauchamp* does not disclose each element of these claims.

For example, Applicants' claim 4 as amended recites:

A system for generating application user interfaces enabling customization of the user interfaces for each of a plurality of users, the system comprising:

a personalization server including a personalization engine and operable to deliver a user profile interface to a client device for each of a plurality of users, the personalization server being further operable to allow each user to modify personalization data for that user through the user profile interface, the personalization data characterizing at least one property of at least one user interface element of the application user interface presented on the client device of each user;

an Internet application server operable to execute at least one selected Internet application of a plurality of Internet applications, the Internet application server including a user interface generator operable to generate at least one application user interface for the selected Internet application, customized for each user using metadata for the at least one application user interface, and the personalization data for each user requesting the at least one application user interface using the client device of each user;

a data repository including a data record for storing the personalization data for each of the plurality of users, the data record being accessible using the metadata; and

a web server operable to deliver the customized application user interface to the client device of each of the plurality of users

Applicants submit that claim 4 as amended recites features that are not taught by *Beauchamp*.

For example, claim 4 recites, among other features:

a personalization server including a personalization engine and operable to deliver a user profile interface to a client device for each of a plurality of users, the personalization server being further operable to allow each user to modify personalization data for that user through the user profile interface, the personalization data characterizing at least one property of at least one user interface element of the application user interface presented on the client device of each user (*emphasis added*)

The Office Action alleges this feature of claim 4 is taught by *Beauchamp* in sections: col. 21, lines 50-56; col. 23, lines 8-19; col. 21, lines 46-51; col. 23, line 66 to col. 24, line 56; col. 5, line 60 to col. 6, line 62; col. 4, lines 13-46. Applicants respectfully disagree and submit that *Beauchamp* in the above sections does not disclose a personalization server that allows a user, using a client device to modify the user's personalization data that characterizes properties of the user interface elements of an application user interface presented to the user on the user's client device.

In col. 21, lines 50-56 and col. 21 lines 46-51, *Beauchamp* describes a business object containing logic to retrieve data from external application or data source and logic to update the data source or combine data from multiple back-end systems. The business object might provide data and behavior required to represent a customer, such as address, contact information, accounts receivable data, etc. In col. 23, lines 8-19, *Beauchamp* describes that a process

administrator may enable access control and workflow features by setting organization's users, roles, and structures and may also set up categories to manage users' personalized launch pads in the universal clients. The categories are organized to allow users to easily locate the process that they need using their launch pad. This only suggests that **users have personalized launch pads presented to the user in the universal client and using the personalized launch pad the user merely locates the process** of interest, the user does not appear to be involved in any personalization. Thus, these sections do not disclose a personalization system where the user using a client device is allowed to make modifications to the user's personalization data characterizing the properties of user interface elements of the application user interface presented to the user on the client device.

In col. 23, line 66 to col. 24, line 56, *Beauchamp* describes a user initiating the execution of a business process from a launch pad screen within the universal client by selecting the desired process from a "to do" list on the launch pad where the list may be **personalized for the user**. The request is sent to the process server 202, which generates an XML response to define the screen, and transmits the XML response to the universal client 200 and the client parses the response to produce the screen and its contents for the user. When **the user clicks a navigation button** upon completion of a process step, the universal client prepares an XML request incorporating the data entered on the screen and the user's action. This paragraph from *Beauchamp* clearly says that the user merely selects a process from the "to do" list personalized for the user and takes some action such as entering data on the screen and clicking a navigation button on the screen; the user does not seem to have any role in the personalization itself. Thus, this section also does not teach any personalization system **where the user using a client device is allowed personalization** and clearly does not allow the user to modify personalization data that characterizes properties of the user interface elements of an application user interface presented to the user on the client device.

From col. 5, line 60 to col. 6, line 62 of *Beauchamp* it is further clear that the user's (on the client computer) role is limited to initiating a predefined process and transmitting navigational control data such as requesting a next step or a previous step of the predefined

process from the server computer. The client computer renders screens such as list screen, tree screen, document screen, calendar screen, etc, solely based on the instructions such as process data received from the server computer, there is no disclosure of user modifying personalization data. Thus, this section also does not disclose that the user using a client device modifies personalization data that characterizes properties of the user interface elements of an application user interface presented to the user on the client device.

In col. 4, lines 13-46, *Beauchamp* describes development and implementation of business processes using predefined standardized screens and linking the screens in an order so as to implement on the computer any activity belonging to the classes for which the standardized screens are appropriate. This section describes the creation of the business process itself, such as on a process server and is not related to a personalization server where a user using a client device can modify the personalization data characterizing the properties of the user interface elements of the application user interface presented to the user on the client device.

Applicants thus submit that *Beauchamp* does not disclose the concept of the “personalization data”, recited in claim 4, as characterizing the properties of the user interface elements and being modifiable by the user using a client device.

Since *Beauchamp* fails to disclose this concept of “personalization data”, Applicants further submit that the various other features of claim 4 that recite this personalization data are also not disclosed by *Beauchamp*.

For example, claim 4 further recites:

an Internet application server operable to execute at least one selected Internet application of a plurality of Internet applications, the Internet application server including a user interface generator operable to generate at least one application user interface for the selected Internet application, **customized for each user** using metadata for the at least one application user interface, **and the personalization data for each user** requesting the at least one application user interface using the client device of each user; (*emphasis added*)

The Office Action alleges that this feature of claim 4 is disclosed by *Beauchamp* in sections: Fig. 9; col. 19, lines 30-34; Fig. 6; Fig. 13, XML 306; Fig. 8-9, 202; col. 5, lines 48-58; Fig. 8 metadata manager 238, context manager 242, process user 232; col. 9, lines 8-30. Applicants respectfully disagree and submit that *Beauchamp* in the above sections does not disclose an

Internet application server including a user interface generator that generates customized application user interface using personalization data for the user requesting the application user interface using a client device.

For example, Fig. 6 illustrates that the process server 202 acts as a broker for the firms various information systems 204 and offers user interface through the universal clients to processes accessing the systems 204. The universal clients 200 request processes from the process server 202 using HTTPS and the process server 202 provides a process one step at a time in XML. Further, Fig. 9 illustrates the components of the universal client 200 involved in processing a response received from the process server to present the response in the user interface, and in the generation of the client data to be sent back to the server. The client data to be sent back to the process server is generated based on user updating values on the screen and clicking from the navigation options. Col. 19, lines 30-34 merely says that the universal clients and process server provide a data-driven process framework that provides a structured method for integrating all of the applications and databases that a person would involve in a business process. Col. 5, lines 48-58 describes that the process data i.e. the steps of the predefined process is stored as metadata in the process database and is accessible by the server computer over the network. Col. 9, lines 8-30 describes that the universal client provides a single business process interface for the various enterprise systems and serves as a common user interface for all the different systems to avoid the user having to deal with multiple complex interfaces and confusing process flows. The components described in Figures 8, 9 and 13 such as the metadata manager 238 extracts necessary process data from the process database 206, where the process data is actually the steps of the predefined process. The user process context (UPC) manager 232 creates a new UPC for a request, where a UPC is a current representation of the executed process, its business objects and data repository. The shared process context manager 242 caches and maintains a copy of each requested process definition where many users may execute the same process.

None of the sections above, including the process data, client data or any other, teach anything about a personalization data as recited above in claim 4 and as discussed above. Applicants thus submit that the sections above fail to disclose anything about an Internet

application system including a user interface generator that generates customized application user interface using personalization data for the user requesting the application user interface using a client device.

Further, claim 4, recites:

a data repository including a data record for storing the **personalization data** for each of the plurality of users, the data record being accessible using the metadata (*emphasis added*)

The Office Action alleges that this feature of claim 4 is disclosed by *Beauchamp* in sections: col. 21, lines 50-56; col. 23, lines 8-19; col. 17, lines 61-67. Applicants respectfully disagree and submit that none of these sections disclose a data repository for storing personalization data for each user.

As discussed above col. 21, lines 50-56; col. 23, lines 8-19 describe a business object that might provide data and behavior required to represent a customer and enabling access control and workflow features by a process administrator which may also include setting up categories to enable users to easily locate a process using the user's personalized launch pad. Col. 17, lines 61-67 describes the process server's connection to all back-end systems including applications and databases where the server maintains connection pools to back-end systems and manages user log-ins and brokers the universal client requests to these systems.

The *Beauchamp* sections above fail to disclose anything about the personalization data as recited in claim 4 and as discussed above. Applicants thus submit that *Beauchamp* does not disclose anything about a data repository storing personalization data for each user.

In light of the various comments discussed above, Applicants submit that claim 4 is allowable over *Beauchamp*.

Applicants submit that dependent claims 5, 6, 78 and 79 that depend from independent claim 4 are also allowable over *Beauchamp* for at least a similar rationale as discussed above for claim 4. The dependent claims are also allowable for additional reasons. Claims 5 and 6 further recite a specific customizable property of the application user interface that allows customization

of the interaction model determining the timing of communication between the client device and the server. This feature is also not disclosed by *Beauchamp*.

Claim 78 is additionally allowable in reciting that:

wherein the at least one property of the at least one user interface element is associated with at least one of mode of data input and output, presentation of requested information, and mode of communication between the client device and the Internet application server

*Beauchamp* does not disclose such a feature wherein the mode of data input and output, presentation of requested information and mode of communication between the client device and server is modifiable for each user interface elements by each user using a client device.

Claim 79 is also additionally allowable in reciting that:

wherein the at least one property of the at least one user interface element includes a tab order property, a find command, a view all command, and an immediate access keystroke sequence

*Beauchamp* does not disclose such a feature wherein the properties of each user interface element such as those recited in claim 79 is modifiable by the user using a client device.

Further, other independent claims 7, 15, 21, 29, 38, 41, 45, 60, and 71 as amended and their respective dependent claims are also allowable over *Beauchamp* at least for a similar rational as discussed above.

Applicants therefore respectfully request that the rejections with respect to claims 4-12, 15-17, 19-27, 29-31, 38-48, 60-64, and 71-74 be withdrawn.

#### **IV. Rejection under 35 U.S.C. §103**

Claim 28 is rejected under 35 U.S.C. §103(a) as being obvious over *Beauchamp* in view of *Helgeson* (US 6,643,652). Applicants submit that Claim 28 is not rendered obvious by *Beauchamp* or *Helgeson* considered individually or in combination.

As discussed above *Beauchamp* does not teach or suggest the feature of Claim 28, as well as the features of its base Claim 21 as amended. *Beauchamp* does not teach an Internet

application system including a user interface generator that generates application user interfaces using personalization data that characterizes the properties of user interface elements included in the application user interface and where the personalization data is modifiable by a user accessing the application user interface using a client device, thus allowing the application user interface to function differently for each user. Combining *Helgeson* with *Beauchamp*, even if there were motivation to do so, still would not make up for the deficiencies in *Beauchamp* with respect to this claim. *Helgeson* is cited merely for teaching a client machine being a wireless device (OA. p. 31). Thus, combining *Helgeson* with *Beauchamp* cannot render obvious Applicants' claim 28. Applicants therefore respectfully request that the rejection with respect to Applicants' claim 28 be withdrawn.

#### **V. Response to Examiners Arguments**

Applicant's claims as amended do not recite the term 'customized interaction' in light of the indefinite language conveyed in terms of the controversial functionality and conflicting nature of the term.

#### **VI. Amendment to the Claims**

Unless otherwise specified or addressed in the remarks section, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

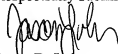


**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 925-472-5000.

Respectfully submitted,



Jason D. Lehr

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 925-472-5000  
Fax: 415-576-0300  
Attachment  
JDL:PP:slh  
61304234 v1